



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

SUBJECT: Final Monthly Report - RCRA/Superfund Industry  
Assistance Hotline Report for September 1987

FROM: Thea McManus  
Office of Solid Waste (WH-562) *McManus*  
*HW*  
Hubert Watters, Office of Emergency  
and Remedial Response (WH-548B)

TO: See list of addressees

This report is prepared and submitted for EPA Contract  
No. 68-01-7371.

I. SIGNIFICANT QUESTIONS AND RESOLVED ISSUES - September 1987

A. RCRA PROGRAM

1. Subtitle D Programs on Indian Lands

Under Subtitle D of the Resource Conservation and Recovery Act, States developed programs according to Federal guidelines for regulation of non-hazardous solid waste. In 40 CFR Parts 240 to 257, EPA established guidelines for solid waste management. What solid waste disposal criteria apply to sanitary landfills on Indian lands? Will those criteria change when the new regulations for municipal landfills are published?

Because State authority generally does not extend to Indian lands, State Subtitle D standards do not apply to sanitary landfills on Indian lands. However, the Federal solid waste disposal criteria apply to sanitary landfills on tribal lands directly. Therefore, Indian lands must follow the guidelines established in 40 CFR Part 257 for solid waste management.

1. Subtitle D Programs on Indian Lands (Continued)

EPA plans to publish proposed regulations for municipal landfills in the Federal Register in the near future. In developing the proposed rulemaking, EPA is examining options for exempting Indian tribes from certain requirements.

Source: Allen Maples (202) 382-4683  
Research: Jennifer Planert

2. Certification of Closure

The owner/operator of a hazardous waste management unit is conducting closure and hires a contractor to certify the closure. 40 CFR 264/265.115 state that certification of closure must be made by an independent, registered, professional engineer. Can the engineer who is employed by the contractor performing the closure, certify the closure of the facility?

Yes, the "RCRA Guidance Manual for Subpart G Closure and Post-Closure Care Standards and Subpart H Cost Estimating Requirements" clarifies that an "independent" engineer cannot be directly employed by the owner or operator of the unit. Also, the May 2, 1986 Federal Register (51 FR 16433) states that, "... the certification should be made by a person who is least subject to conscious or subconscious pressures to certify to the adequacy of a closure that in fact is not in accordance with the approved closure plan."

Source: Sharon Frey (202) 475-6725  
Research: Chris Bryant

3. Waste Identification

A company generates aerosol paint and solvent cans from painting and cleaning operations. The cans are empty as per common industry practices used to empty such devices to less than 3% by weight of the total capacity of the container (40 CFR 261.7(b)(1(i) & (iii))). The cans may still contain propellant, making the cans reactive if put in contact with a strong initiating force (i.e., intense pressure or heat). Since for all practicable purposes the cans are free of contents that might have been hazardous wastes, would this be regulation of the aerosol cans themselves? RIL #43 specifically excluded the regulation of the cans, and solely addressed only the potentially hazardous contents. Therefore, would aerosol cans free of hazardous waste, but still potentially reactive because of contained propellant be regulated as hazardous waste?

### 3. Waste Identification (Continued)

Irrespective of the lack of contained waste, the aerosol cans would be a RCRA hazardous waste because they demonstrate the hazardous characteristic of reactivity (40 CFR 261.23(a)(6)).

Source: Mike Petruska (202) 475-6676

Research: Andy O'Hare

### 4. Treatment of Infectious Waste

There is growing national concern over proper infectious waste management. What are some of the treatment methods currently used for infectious wastes?

Although RCRA section 1004 includes wastes with infectious characteristics in the definition of hazardous waste, there are presently no Federal regulations for management of infectious waste under RCRA Subtitle C. Instead, regulation of infectious waste has been left up to the States' discretion. EPA has, however, issued a guidance manual entitled EPA Guidance for Infectious Waste Management (May 1986), available through NTIS (publication number PB-86-199130) which describes numerous methods for effective treatment of infectious waste. Many treatment methods employ some form of heat or chemical sterilization.

Steam sterilization uses steam at a temperature high enough to kill infectious agents in combination with pressurization in a vessel such as a steam sterilizer, autoclave, or retort. Steam sterilization is an effective treatment method for low-density wastes such as plastics. A method that can be used for most types of infectious waste is incineration. Incineration converts combustible wastes into a noncombustible ash while combustion gases are vented to the atmosphere. A third type of heat-related treatment is thermal inactivation. For liquid wastes, thermal inactivation heats the waste at a set temperature for a designated period of time. Solids may be chemically inactivated by heating them in an oven, typically at 320 degrees to 380 degrees Fahrenheit for two to four hours.

Chemical treatment methods include gas/vapor sterilization and chemical disinfection. In gas/vapor sterilization, the infectious waste is fumigated with a gaseous or vaporized chemical such as ethylene oxide or formaldehyde. Chemical disinfection (the name is self-explanatory) is effective for liquid wastes but may also be used for solid wastes.

A technology that may be used in the future is sterilization by irradiation. Ionizing radiation has already been used to sterilize other materials such as food and medical supplies.

Source: Jacqui Sales (202)475-8933  
Research: Jennifer B. Planert

5. Land Disposal Restrictions - Halogenated Organic Carbons

An F001/F002 waste subject to the November 7, 1986 Federal Register land disposal restrictions meets the criteria for the 1% national variance specified in Section 268.30. In the July 8, 1987 Federal Register, treatment standards were set for most HOCs. F001 and F002 wastes are also HOCs. Would the F001/F002 wastestream be subject to the newly-promulgated HOC treatment standards even though it has been granted a two-year variance F005 solvent wastes?

The solvent would only be subject to the treatment standards and effective date in the November 7, 1986 rule. In 52 FR 25762, it says that "where treatment standards and prohibition effective dates are promulgated for California list waste constituents that are also covered under the November 7, 1986 rule, the treatment standards and effective dates from the prior rule apply."

The general rule is that where a constituent is subject to more than one treatment standard, the treatment standard (and effective date) for the more specific constituent applies. Example: the F001-F005 treatment standard/effective date presides because, as a subset of the HOCs, it is more specific.

Also, for a waste where two or more treatment standards apply because of different constituents (e.g., F001 and Lead), both would apply with respective effective dates. In the case above mixed with lead, the F001/F002 treatment standards and effective date would apply for the solvent constituents (rather than the HOC standard) and would get a variance until 11/8/88. However, the lead would be subject to the requirements effective 7/8/87.

Source: Mitch Kidwell (202) 382-4770  
Research: Mark Janaskie

6. SW-846 Test Method 3060

Why was Method 3060, for alkaline digestion to hexavalent chromium, dropped from the third edition of EPA's "Test Method for Evaluating Solid Waste?" Is there a replacement method?

The SW-846 Test Method #3060 is used to determine the total concentration of hexavalent chromium in solid waste. It uses a basic digestion of the waste sample to solubilize both water-insoluble and water-soluble hexavalent chromium compounds.

Method 3060 was dropped from the third edition of the SW-846 Manual because it yielded inconsistent results from sample to sample within the same matrix and from matrix to matrix. The method also provides the analyst with no way of distinguishing when it would or would not work.

An evaluation study of Method 3060 indicates that not only is it possible to oxidize  $\text{Cr}^{+3}$  to  $\text{Cr}^{+6}$ , but that  $\text{Cr}^{+6}$  can be reduced to  $\text{Cr}^{+3}$  during digestion. In fact, there is more likelihood that  $\text{Cr}^{+6}$  is reduced than  $\text{Cr}^{+3}$  oxidized. Also during the digestion, precipitates are formed which can present problems.

It may be appropriate to continue using Method 3060, provided the user can demonstrate that it works by doing spike recoveries. At this time EPA does not have a current or expected replacement method for Method 3060.

Source: Denise Zabinski (202) 382-7458  
Research: Joe Nixon

7. Land Disposal Restrictions - California List

A manufacturer produces an aqueous waste stream containing 250 mg/l nickel, 1600 mg/l free cyanides, and 650 mg/l chromium (VI) at a rate of approximately 5000 gallons/month. The waste stream is characteristically hazardous due to the presence of free cyanides and chromium (VI) (D003 and D007, per 40 CFR Section 261.23-24). The manufacturer has the waste shipped via tank truck to a commercial wastewater treatment facility that treats the wastewater in tanks. The wastewater treatment facility has a contract with a metals recovery firm to accept the sludges after treatment for reclamation.

- a) In addition to normal manifesting requirements, what must the manufacturer do in order to comply with the land disposal restrictions for his off-site waste shipments?

7. Land Disposal Restrictions - California List (Continued)

b) If the manufacturer has a wastewater treatment facility constructed and, as a result, will be discharging the liquid portion of his waste under a NPDES permit and shipping his non-liquid sludges to a metals recovery facility, how will the off-site shipment of the sludge be regulated?

a) The manufacturer's aqueous waste stream is restricted from land disposal according to Sections 3004(d)(2)(A), (b)(iii), and (B)(vi) of RCRA, which prohibit the land disposal of liquid hazardous wastes containing greater than 1000 mg/l free cyanides, 500 mg/l chromium (VI), and 134 mg/l nickel. Consequently, the off-site shipment of his aqueous waste stream must be accompanied by a notification to the treatment facility of the applicable prohibitions in Section 3004(d) of RCRA, per 40 CFR 268.7(a)(1). The notice must include the following information:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standards and all applicable prohibitions set forth in Section 268.32 or RCRA Section 3004(c);
- (iii) The manifest number associated with the shipment of waste; and
- (iv) Waste analysis data, where available.

b) If the manufacturer's wastewater treatment sludge is hazardous only because of characteristics, as identified in 40 CFR 261 Subpart C, and the sludge is sent to a facility which reclaims metals from the sludge, the sludge is no longer subject to the land disposal restrictions of 40 CFR Part 268. 40 CFR 260.10 defines a sludge as "any solid, semi-solid, or liquid waste generated from a municipal, commercial or industrial wastewater treatment plant, water supply treatment plan, or air pollution control facility exclusive of the treated effluent from a wastewater treatment plant." According to 40 CFR 261.2, a sludge which exhibits a characteristic of a hazardous waste is not a solid waste (and therefore not a hazardous waste, per 40 CFR 261.3) if it is to be sent for reclamation. Pursuant to 40 CFR 268.1(a), the land disposal restrictions of 40 CFR Part 268 apply specifically to hazardous wastes. Consequently, if the waste is not a hazardous waste under RCRA, the regulations of 40 CFR 268 do not apply.

Source: Matt Straus (202) 475-8551  
Mitch Kidwell (202) 382-4805  
Research: Kris Andersen

8. Land Disposal Restrictions - Corrosive Waste

A manufacturer generates an acidic aqueous hazardous waste stream (D002, per 40 CFR 26.122(a)) with a pH of 1.8 in his production process. The waste is piped from the production area to an acid neutralization tank, where the pH is raised to an average of 3.0. After treatment, the waste stream is shipped off-site to a commercial wastewater treatment plant where it is neutralized further and then discharged under a NPDES permit. Must the manufacturer comply with the requirement of 40 CFR 268.7(a)(2) to certify that the restricted waste may be land disposed without further treatment when he ships the waste off-site?

No. If the waste stream was hazardous solely for the characteristic of corrosivity (40 CFR 261.22(a)) and after treatment it does not exhibit any characteristic of a hazardous waste, as described in Subpart C of Part 261, the waste is no longer a hazardous waste (40 CFR 261.3(d)(1)).

According to the applicability provisions set forth in 40 CFR 268.1(a), "This part identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be land disposed." Consequently, if the waste cannot be identified as a hazardous waste under RCRA, then the regulations of Part 268 do not apply, including the certification requirement of 40 CFR 268.7(a)(2).

Source: Mitch Kidwell (202) 382-4805  
Research: Kris Andersen

B. Superfund

9. Re-Opener Clause in Covenants Not to Sue

EPA published a policy memorandum in the July 27, 1987 Federal Register (52 FR 28038) concerning covenants not to sue. The Superfund Amendments and Reauthorization Act (SARA) of 1986 provides for covenants not to sue under Section 122(f). According to this provision, EPA may issue covenants not to sue for CERCLA liability, including future liability, in settlement of some CERCLA cases. One goal behind this provision is to encourage timely settlements between responsible parties and EPA. SARA Section 122(f)(3) requires that EPA certify that a remedial action is complete in order for a covenant not

8. Re-Opener Clause in Covenants Not to Sue (Continued)

to sue for future liability to be effective. If EPA issues a covenant not to sue for future liability to a settling party, but the remedy at the site subsequently fails or additional problems arise at the site, does the covenant not to sue remain in effect?

The covenant not to sue would not remain in effect in these cases according to the policy set forth in the July 27, 1987 Federal Register. SARA Section 122(f)(6)(A) explicitly requires the EPA to include a "re-opener" clause in the covenant in the event that problems arise from conditions at the site that were unknown at the time EPA certified complete remedial action. In addition, Section 122(f)(6)(C) allows EPA to include a condition in covenants not to sue, allowing for future enforcement actions under Section 106 or Section 107 to ensure protection of public health and the environment.

In its July 27, 1987 policy, EPA interprets Section 122(f)(6)(C) as authorizing a "re-opener" in the covenant to address liability in the case of remedy failure, i.e., the remedy fails to protect public health and the environment. (See 52 FR 28041 and 28042.)

EPA may forego the reopener clause for future liability in three situations. Under Section 122(f)(6)(B), EPA may waive the unknown conditions re-opener if extraordinary circumstances exist and the settlement agreement provides reasonable assurance that public health and the environment will still be protected. In addition, Section 122(f)(2) provides for special covenants not to sue for future liability if: (1) EPA requires off-site disposal after rejecting a proposed on-site remedy that is consistent with the NCP, or (2) the chosen remedy includes complete destruction, elimination or permanent immobilization of the hazardous substances so that they present no foreseeable future risk to health and the environment.

Source: Jon Fleuchas (202) 382-3077  
Research: Jennifer Planert

10. Hazard Ranking System

How are "facility," "site," "unit," and "release," defined under CERCLA? Which of the above mentioned areas is characterized when applying the Hazard Ranking



10. Hazard Ranking System (Continued)

System (HRS) to determine whether that area is eligible to be placed on the National Priorities List (NPL)?

The term "facility" is defined in CERCLA Section 101(9) and in the National Contingency Plan (NCP) at 40 CFR 300.6 as "any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel" (emphasis added). Release is defined in CERCLA Section 101(22) and codified at 40 CFR 300.6 as including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injection, escaping, leaching, dumping, or disposing into the environment." There are no statutory or regulatory definitions of either "site" or "unit" under CERCLA. The term "site" is a generic term that is often used when referring to the area or location at which there has been a release, and which is undergoing some type of a Superfund response action. Generally a "site" and a "facility" refer to the same area. Although "unit" is not specifically defined under CERCLA, the use of this term commonly carries a meaning equivalent to the RCRA term "hazardous waste management unit" (HWMU) which is defined in 40 CFR 260.10 as "a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area. Examples of HWMUs included a surface impoundment, a waste pile, a land treatment area, a landfill cell, an incinerator, a tank and its associated piping and underlying containment system and a container storage area. A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed."

Section 105(a)(8)(A) of CERCLA requires that EPA develop a system for "determining priorities among releases or threatened releases" and that system "shall be based on relative risk of danger to public health or welfare or the environment... taking into account... the population at risk, the sensitive ecosystems... and other appropriate factors" (emphasis added). Appendix A to 40 CFR

## 10. Hazard Ranking System (Continued)

Part 300 contains EPA's User's Manual for the Hazard Ranking System (HRS). The introduction describes an HRS that is to be used in "evaluating the relative potential of uncontrolled hazardous substance facilities to cause health or safety problems, or ecological or environmental damage." Based on these statutory and regulatory discussions one may infer that "facility" and "release" are very broad definitions and are used almost interchangeably when applying the HRS and when conducting any subsequent response action. When EPA investigates an area and is gathering all relevant information to determine the relative risk for danger that is present, it is the "release," which can be synonymous with "facility," which is characterized and addressed for the purposes of applying the HRS. There is no discussion in Section 105 of a "site" or a "unit for the purposes of determining a potential NPL identification. Boundaries are not definitively drawn at the time of the HRS scoring or NPL promulgation, but are further defined at a later time, usually during the Remedial Investigation/Feasibility Study (RI/FS) phase. Section 104(d)(4) of CERCLA allows EPA to treat two or more non-contiguous facilities as one for the purposes of response actions if the facilities are "reasonably related on the basis of geography, or on the basis of threat, or potential threat to the public health or welfare or the environment." Since listing is for the purpose of prioritizing potential response actions, Section 104(d)(4) extends to the listing of sites as well. The September 8, 1983 Federal Register (48 FR 40663) states that in most circumstances sites will be scored and listed on the NPL individually, because this approach more accurately represents the hazards and potential hazards present at the site. The criteria that EPA evaluates when determining whether to list two or more sites together include: (1) whether they were part of the same operation, (2) whether the contamination from the sites are threatening the same ground or surface water resource, and (3) the distance between the non-contiguous sites and whether the target population is essentially the same (40 FR 40663). Listing similar sites separately does not preclude EPA from approaching the remedial activities of non-contiguous sites as one, or from addressing individual units at one NPL site with different actions where it is more appropriate or beneficial.

Source: Suzanne Wells (202) 475-8103  
Research: Deborah McKie

## II. ACTIVITIES - September 1987

- A. The RCRA/Superfund and CEPP Hotlines responded to 14,100 questions and requests for documents in September. The breakdown is as follows:

	<u>RCRA</u>	<u>Superfund</u>	<u>UST</u>	<u>CEPP</u>		
Information Calls	5913	1435	659	1979	=	9,986
Call Document Requests	907	95	395	719	=	2,116
Written Document Requests	207			456	=	663
Referrals	<u>1208</u>			<u>127</u>	=	<u>1,335</u>
	8,235	1,530	1,054	3,281	=	14,100

- B. On September 1, Kim Jennings of the CEPP Hotline attended the Title III Workgroup meeting on the Status of Title III activities.
- C. On September 2, Joe Nixon and Laurie Huber of the RCRA/Superfund Hotline briefed the Hotline staff on an underground storage tank and piping field trip.
- D. On September 1, 8, 15, 22, and 29; the CEPP Hotline attended the weekly Preparedness staff meetings.
- E. On September 11 and 25, Robert Costa of the CEPP Hotline attended the Preparedness Staff Conference Call with the FEMA/EPA Regional Preparedness Coordinators on Status of Regional Title III activities.
- F. On September 14 and 15, Laurie Huber of the RCRA/Superfund Hotline briefed the UST staff on Hotline functions and activities.
- G. On September 14 and 15, the CEPP Hotline staff attended the RRT Co-Chairs meeting.
- H. On September 15, Robert Costa of the CEPP Hotline attended the Title III Workgroup meeting on the status of Title III activities.
- I. On September 22, Jennifer Planert of the RCRA/Superfund Hotline attended a Federal Facilities Workshop meeting.
- J. On September 29, Kim Jennings of the CEPP Hotline attended the Title III Workgroup meeting on the status of Title III activities.

## II. ANALYSES OF QUESTIONS - September 1987

## SUMMARY OF CALLS BY GEOGRAPHIC DISTRIBUTION (EPA REGIONS):

1	5%	3	26.3%	5	20%	7	3.1%	9	7.5%
2	11.1%	4	12.0%	6	7.3%	8	6.0%	10	2.0%

INTERNATIONAL CALLS: 0.1%

Manufacturers	7.0%	State Agencies	4.6%	Universities/Researchers	1.9%
Generators	15.0%	Local Agencies	1.2%	Trade Associations	1.0%
Transporters	1.1%	Used Oil Handlers	1.0%	Insurance Co	0.2%
TSDF's	7.6%	UST O/O	5.3%	Environmental Groups	0.8%
EPA HQ	3.0%	Consultants	29.4%	Press	0.7%
EPA Regions	3.0%	Attorneys	6.8%	Citizens	3.4%
Federal Agencies	2.0%	Laboratories	2.4%	Other	2.3%

RCRA

General Information		542	264/265 TSDF	
3010 Notification		79	A - Scope/Applicability	120
260.10 Definitions		84	B - General Facility Standards	42
260.22 Petitions/Delisting		47	C - Preparedness/Prevention	8
261.2 Solid Waste Definition		135	D - Contingency Plans	14
261.3 Hazardous Waste Definition		232	E - Manifest/Recordkeeping/Reporting	53
261 C Characteristic HW		423	F - Ground Water Monitoring	147
261 D Listed HW		520	G - Closure/Post Closure	115
261.4 Exclusions		157	H - Financial Requirements	34
261.5 Small Quantity Generators		133	I - Containers	42
261.6 Recycling Standards		108	J - Tanks	194
261.7 Container Residues		35	K - Surface Impoundments	68
266 C Use Constituting Disposal		9	L - Waste Piles	8
266 D HW Burned for Energy Recovery		74	M - Land Treatment	3
266 E Used Oil Burned for			N - Landfills	46
Energy Recovery		104	Liquids in Landfills	39
266 F Precious Metal Reclamation		18	O - Incinerators	66
266 G Spent Lead-Acid Battery			P - Thermal Treatment	7
Reclamation		15	Q - Chem, Phys, Biol Treatment	2
262 Generator - General		163	R - Underground Injection	9
100-1000 kg/mo		80	X - Miscellaneous	14
Manifest Info		85	268 - Solvents & Dioxins	155
Accumulation		81	California List Wastes	140
Recordkeeping & Reporting		25	Scheduled Thirds	15
International Shipments		10	General	97
263 Transporter		49	269 - Air Emission Standards	18
Subtitle D		132	A - General	63
Used Oil - General		65	B - Permit Application	40
Household Hazardous Waste		25	D - Changes to Permits	27
Dioxins		34	F - Special Permits	28
Mixed Radioactive Waste		41	G - Interim Status/LOIS	47
Minimum Technology		41	271 - State Programs	122
Infectious Waste		28	124 - Administrative Procedures	6
Liability/Enforcement		110	DOT Requirements	86
Corrective Action		76	OSHA Requirements/HW Technologies	45
Waste Minimization		27	Test Methods/HW Technologies	138
Asbestos/PCBs/Radon		68	RCRA Document Requests	907
			SUBTOTAL	* 6820

# UNDERGROUND STORAGE TANKS

General	168
280.10 Applicability	54
280.11 Interim Prohibition	40
280.12 Definitions - General	20
UST	47
Regulated Substance	32
280 B New UST Systems - General	9
280.20 Performance Standards	20
280.21 Upgrading	11
280.22 Notification	37
280 C General Operating Requirements	8
280 D Release Detection	37
280 E Release Reporting and Investigation	20
280 F Corrective Action - Petroleum	25
280 G Corrective Action - Hazardous Substances	8
280 H Out-of-Service/Closure	58
280 I Financial Responsibility	27
281 State UST Programs	14
Liability	6
Enforcement	5
LUST Trust Fund	6
Other Provision	7
UST DOC REQ.	395
SUBTOTAL	* 1054

Referrals - EPA - HQ	267
- Regions	117
- State	133
- GPO/NTIS/PIC/ORD/Dockets	390
- Other	301
- SUBTOTAL	* 1208

Requests responded to by Hotline	126
Referred to EPA Program Offices	8
Referred to other Federal Agencies	12
Referred externally (states, organization, etc)	1
Response Form Sent	-
Response Form Sent/FOIA	-
Form Letter Sent/Need more info	-
Requests filled - RCRA	31
- CERCLA	10
- UST	19
SUBTOTAL	* 207

Written Responses: Total 92

# CERCLA

September 1987

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SARA General	58
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Allocations from Fund/	
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Contracts/Contract Lab Program	48
Exposure Assessment/	
Public Health Evaluation	34
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Enforcement	34
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HRS	26
Liability/PRPs	69
Mandatory Schedules	2
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NBARs	9
NCP	41
NPL	128
Off-Site Policy	22
On-Site Policy	6
PA/SI	8
Radon	2
RD/RA	3
Remedial	40
Removal	16
RI/FS	27
RODs/Clean-Up Costs	41
Settlements	45
SITE Program	23
State Participation	9
Taxes	9
Title III/Right-To-Know	136
Other Provisions	11
CERCLA DOC REQ.	95
CERCLA SUBTOTAL	* 1530

CEPP Hotline  
Daily/Monthly Summary Report  
For SEPTEMBER 1987

Total Calls: 3281

Written Requests: 456

Distribution of Calls by EPA Regions:

1	6.6%	3	15.9%	5	25.4%	7	3.5%
2	11.2%	4	15.2%	6	7.5%	8	2.2%
9	8.1%	10	1.6%				
International	0.2%			Unknown	1.9%		

Callers:

Manufacturers	49.1%	State Agencies	4.9%
Distributors	1.3%	Fire Depts.	2.1%
Handlers	7.9%	EPA	2.1%
Attorneys	6.0%	Local Officials	4.0%
Consultants/Engineers	9.2%	Farmers	0.8%
Laboratories	1.8%	Federal Agencies	1.3%
Trade Associations	1.8%	Media/Press	0.8%
Public Interest Groups	1.0%	Union/Labor	0.1%
Universities/Academia	1.4%	Citizens	1.8%
Insurance Companies	0.1%	Other	1.1%
Hospitals	0.4%		

Title III: General	556
\$301-3 Emergency Planning:	225
SERC's	201
Notification Requirements	121
TPQ's	63
Sec. 305 Training Grants	18
Sec. 305 Emergency Review	1
Mixtures	37
Extremely Haz. Substances	248

Release Notification: General 80

Notification Requirements	65	CERCLA vs. Sec. 304	46
Reportable Quantities	24	Transportation	18
R Q's vs. TPQ's	13	Exemptions	32

CEPP Hotline Daily/Monthly Summary Report (Continued)

EC, 311/312: General	982		
SDS Reporting Regulations	815	Haza Categories	309
ier I/II Regulatoins	209	Mixtures	117
hresholds	822	Exemptions	158
ec, 312: General	180		
hresholds	32		
ublic Meetings	0		
ass Balance Study	0		
Trade Secrets	55		
inforcement	20		
CEPP: Interim Guidance	21		
Tech. Guidance			
hemical Profiles	18		
RT - 1	127		
eleconference	7		
itle III Workshops	4		
ther	33		
Document Requests	719		
of Documents Requested	1473		
Referrals			
OTS (Section 313)	28	RCRA/Superfund Hotline	41
OSHA	46	Regional EPA	0
Preparedness Staff	0	Other	12

IV. PUBLICATIONS - September 1987

RCRA

"Summary of Appropriate Analytical Methods for Appendix IX; Parts I and II," is available from the National Technical Information Service (NTIS). The number is PB87-230-371. The cost is \$48.95 for paper copy and \$6.50 for microfiche. NTIS's telephone number is (703) 487-4860.

"Siting Guidelines for Disposal of Mixed Waste," EPA/530-SW-029, is available by calling the Hotline.

"Guidance on Conceptual Design Approval for Commercial Low-Level Radioactive and Hazardous Waste Disposal Facilities," EPA/530-SW-87-027, is available by calling the Hotline.

"Implementation Strategy to Accompany the Proposed Rule for Burning of Hazardous Waste Fuels," OSW #9494.00-1, is available for viewing at the RCRA Docket.

"Guidance for POTW's Directly Receiving Hazardous Waste," dated July 21, 1987, is available by calling Paul Connor at (202) 475-7718 or at regional offices.

"Proceedings of the First Annual EPA Symposium on Solid Waste Testing and Quality Assurance," July 13-17, 1987, is available by calling Dan Hansen at the American Public Works Association.

"Final Guidance on the Use of Alternative Dispute Resolution Techniques in Enforcement Actions," August 14, 1987, is available from the Public Information Center (PIC).

The following documents are available from the Office of Groundwater Protection, (202) 382-7077:

"State and Territory Groundwater Classification Systems".

"Survey of State Groundwater Quality Protection Legislation," 1985.

"EPA Activities Related to Source of Groundwater Contamination".

"Groundwater Data Management with STORET".



#### IV. PUBLICATIONS (Continued)

##### CERCLA

"Superfund Risk Assessment Information Directory," is available from the Public Information Center (PIC).

"RI/FS Improvement Analysis Manual," July 1987 is available for viewing at the Superfund Docket and at the Regional offices.

"PRP Search Manual," is available at the National Technical Information Service (NTIS). The number is PB 87-2324-76. NTIS's telephone number is (703) 487-4860.

"The memo entitled "Entry and Continued Access under SARA," dated June 5, 1986, is available by calling John Fleuchas at (202) 382-3109.

"Community Relations in Superfund: A Handbook," OSWER Directive #9230.0-3A (March 1986) is available by writing to OERR.

The memo entitled "Superfund Project Execution," dated August 1987, is available at the Public Information Center (PIC).

"Compendium of Superfund Field Operations Methods," OSWER Directive #9355.0-14 (EPA/540-P-87/001A) is available from ORD in Cincinnati. Their telephone number is (513) 569-7562.

V. FEDERAL REGISTER NOTICES - September 1987

Former Notices with Open Comment Period

July 6, 1987; 52 <u>FR</u> 25255 (proposed rule-administrative enforcement actions in the UST program)	Proposed rule to extend the applicability of the consolidated rules of practice (40 CFR 22) which govern administrative enforcement actions taken pursuant to Section 9006, SDWA, as amended. Comments will be accepted until September 4, 1986.
July 20, 1987; 52 <u>FR</u> 27226 (proposed deletion of substance from Title III Section 313 List of Toxic Substances)	Proposed rule deleting butyl benzyl phthalate from the list of toxic chemicals under Section 313 of Title III of SARA. Comments will be accepted until October 19, 1987.
July 20, 1987; 52 <u>FR</u> 27257 (notice of draft updated assessments for trichloroethylene and dichloromethane)	Notice of availability of three documents for external review. The documents address addenda to the health assessments for trichloroethylene and dichloromethane and new methods regarding dichloromethane. Comments will be accepted until September 9, 1987.
July 22, 1987; 52 <u>FR</u> 27579 (notice of availability of guidance manual)	Notice of availability of <u>Alternate Concentration Limit Guidance: Policy and Information Requirements</u> . Comments will be accepted until September 21, 1987.
August 4, 1987; 52 <u>FR</u> 28866 (extension of NBARs comment period)	Notice of extended public comment period concerning the Interim Guidelines on Nonbinding Preliminary Allocations of Responsibility (NBAR) to September 3, 1987.
August 5, 1987; 52 <u>FR</u> 29060 (notice of Science Advisory Board meeting on HRS)	Notice of Science Advisory Board meeting concerning revisions of the Hazard Ranking System (HRS). The meeting will be held September 14 and 15, 1987 in Washington, D.C.
August 10, 1987; 52 <u>FR</u> 29620 (OSHA hazardous waste operations and emergency response)	Notice of proposed rulemaking by OSHA on hazardous waste operations and emergency response. Comments will be received on or before October 5, 1987.

RCRA/Superfund Hotline

National Toll Free #800-424-9346, Washington, D.C. Metro #202-382-3000

August 11, 1987; 52 FR 29708  
(extension of comment period)

Response to petition on mobile treatment units. Comment period on regulatory exclusion portion of the rule extended to September 3, 1987.

August 12, 1987; 52 FR 29992  
(notice of data, request for comment)

Notice of data availability and request for comments, Land Disposal Restrictions on waste containing prohibition levels of California List metals and cyanide. Comments will be accepted on or before October 13, 1987.

August 14, 1987; 52 FR 30570  
(proposed rule changes to interim status and permitted facilities and post-closure permits)

Proposed rule regarding changes to interim status and permitted facilities, and procedures for post-closure permitting. Comments will be accepted on or before October 13, 1987.

August 24, 1987; 52 FR 31948  
(proposed rule regarding statistical methods for ground-water data analysis)

Proposed rule for changing the statistical analysis method used in determining statistically significant changes in levels of hazardous constituents measured in ground-water samples. Comments will be accepted on or before October 23, 1987.

August 27, 1987; 52 FR 32446  
(land disposal restrictions for underground injection wells)

Proposed rule implementing underground injection restrictions of certain hazardous waste, and land disposal restrictions technical requirement for Class I hazardous waste injection wells. Comments will be accepted on or before October 26, 1987, and a public hearing will be held September 21, 1987 in Washington, D.C.

August 27, 1987; 52 FR 32496  
(notice of ARAR guidance)

Notice of interim guidance on compliance with applicable or relevant and appropriate requirements. Comments will be accepted until October 13, 1987.

RCRA/Superfund Hotline

National Toll Free #800-424-9346, Washington, D.C. Metro #202-382-3000

September 2, 1987; 52 FR  
33284 (comment period  
extension on De Minimis  
settlement interim  
guidance)

Notice of extending the comment period  
on the "Interim Guidance on  
Settlements with De Minimis Waste  
Contributors" under Section 122(g) of  
SARA. The interim guidance was  
published on June 30, 1987 (52 FR  
24333). Comments will be accepted  
until September 30, 1987.

September 9, 1987; 52 FR  
33960 (comment period  
extension on RCRA admin-  
istrative enforcement  
orders under Section  
3008(h))

Notice extending the comment period on  
August 6, 1987, proposed rule on the  
issuance of and Administrative  
Hearings on RCRA Section 3008(h)  
corrective action orders. Comments  
will be accepted until September 22,  
1987.

September 29, 1987; 52 FR  
36461 (comment period on  
covenants not to sue)

Notice extending the comment period on  
the interim guidance governing the  
issuance of covenants not to sue under  
Section 122(f) of SARA. The interim  
guidance was published on the July 27,  
1987 (52 FR 28038). Comments will be  
accepted until October 30, 1987.

September Federal Register Notices

September 2, 1987; 52 FR  
33284 (extension of comment  
period)

Extension of public comment period on  
the Interim Guidance on Settlements  
with De Minimis Waste Contributors.  
Comments will be accepted until  
September 30, 1987.

September 3, 1987; 52 FR  
33439 (proposed delistings)

Proposed rule to delist waste streams  
from Syntex Agribusiness, St. Louis,  
MO. Comments will be accepted until  
October 5, 1987.

September 3, 1987; 52 FR  
33446 (notice of intent to  
delete sites)

Notice of intent to delete three sites  
from the National Priorities List and  
request for comments. The sites are  
the Middletown Road Dump, Annapolis,  
MD, Harris (Farley Street), Houston,  
TX, and Mountain View Mobile Home  
Estates, Globe, AZ. Comments will be  
accepted for 30 days from September 3,  
1987.

RCRA/Superfund Hotline

National Toll Free #800-424-9346, Washington, D.C. Metro #202-382-3000

September 3, 1987; 52 FR  
33480 (proposed consent  
decrees)

Notice of proposed decrees lodged in the Southern District of Texas for the "Motco Site", and in the District of Massachusetts, for the Hocomonco Pond Site. Comments will be accepted for 30 days from September 3, 1987.

September 8, 1987; 52 FR  
33812 (removal of regula-  
tions)

Final rule withdrawing two procedural rules concerning the Arbitration Procedures and Natural Resource Claims for the Hazardous Substance Superfund.

September 9, 1987; 52 FR  
33960 (extension of  
comment period)

Extension of public comment period on the August 6, 1987 proposal concerning administrative enforcement orders under Section 3008(h) to September 22, 1987 (40 CFR Parts 22 and 24).

September 9, 1987; 52 FR  
33936 (correction to  
final rule)

Correction to the final Section 270.14, Development of Corrective Action Programs After Permitting Hazardous Waste Land Disposal Facilities.

September 10, 1987; 52 FR  
34328 (notice of consent  
decree)

Settlement Agreement Pursuant to CERCLA Harvey and Knotts hazardous waste site in New Castle County, Delaware, United States vs. General Motors Corporation. Comments will be accepted by the Assistant Attorney General.

September 15, 1987; 52 FR  
34779 (notice of extension  
of compliance date)

Extension of date for submission of Part A Permit Applications for Certain Cement Kilns Burning Hazardous Waste.

September 18, 1987; 52 FR  
35279 (request for comments)

Request for comments on expanding the sample exclusion in 40 CFR Section 261.4(d) to include samples sent for treatability studies. Comments will be accepted until October 19, 1987.

September 21, 1987; 52 FR  
35452 (Final State Program  
Authorization-Proposed)

Proposal for Wisconsin's Final Authorization of state hazardous waste management program-applications for revisions. Comments will be accepted until October 21, 1987.

RCRA/Superfund Hotline

National Toll Free #800-424-9346, Washington, D.C. Metro #202-382-3000

September 22, 1987; 52 FR  
35577 (notice of proposed  
administrative settlement  
CERCLA)

Notice of proposed administrative  
settlement concerning the Union  
Chemical Co., Inc. hazardous waste  
site in South Hope, Maine, in  
accordance with Section 122(i)(1).  
Comments will be accepted for 30 days  
from September 22, 1987.

September 22, 1987; 52 FR  
35604 (notice of availa-  
bility of a joint guidance  
document)

Notice of availability of a joint  
guidance document between EPA and the  
Nuclear Regulatory Commission  
concerning the Conceptual Design  
Approach for Commercial Mixed Low-  
Level Radioactive Waste Disposal  
Facilities, from the RCRA/Superfund  
Hotline.

September 22, 1987; 52 FR  
35556 (notice of compliance  
schedule to adopt State  
Program Modification)

Final authorization of Washington's  
State Hazardous Waste Management  
Program; Final Rule effective  
November 23, 1987 unless a Federal  
Register notice is published  
withdrawing this action. Comments  
will be accepted until October 22,  
1987.

September 23, 1987; 52 FR  
35767 (notice of grant  
issuance)

\$1.2 million grant issued to the  
National Governors Association to  
implement Section 104(K) of SARA (the  
State Capacity Assurance Project).

September 23, 1987; 52 FR  
35838 (proposal to amend HW  
permit modification  
regulations)

Proposal to amend regulations  
governing modifications of hazardous  
waste management permits. New  
procedure that applies to various  
types of changes at a facility.  
Comments will be accepted until  
November 23, 1987.

September 23, 1987; 52 FR  
35894 (final rule for SQG  
exception reporting)

Finalization of the modified exception  
reporting requirement for small  
quantity generators of hazardous  
waste.

RCRA/Superfund Hotline

National Toll Free #800-424-9346, Washington, D.C. Metro #202-382-3000

September 28, 1987; 52 FR  
36311 (lodging of consent  
decree)

Notice of consent decree lodged in the District of Connecticut for cost recovery of response costs incurred under CERCLA Section 107 and RCRA Section 3008. The case was United States vs. City of Derby, Connecticut. Comments will be accepted for 30 days from September 28, 1987.

September 29, 1987; 52 FR  
36444 (notice of proposed  
rulemaking)

Notice proposing final reauthorization for Indiana's hazardous waste management program. The final authorization would not include authorization to implement HSWA. Comments will be accepted until October 29, 1987. The action will become final unless withdrawn in a subsequent FR notice.

September 29, 1987; 52 FR  
36461 (extension of comment  
period)

Notice extending the public comment period for the interim guidance on covenants not to sue under CERCLA Section 122(f). Comments will be accepted until October 30, 1987.

September 30, 1987; 52 FR  
36616 (notice of Science  
Advisory Board meeting)

Notice of Science Advisory Board's Radon Advisory Committee meetings, October 13-16, 1987 in Washington, D.C.

September 30, 1987; 52 FR  
36643 (notice of proposed  
consent decree)

Notice of proposed consent decree lodged in the District of Rhode Island regarding the Picillo Farm Superfund site in Coventry, Rhode Island, under CERCLA Section 122(f)(2) and RCRA Section 7003(d). Comments will be accepted until October 30, 1987.

September 30, 1987; 52 FR  
36644 (notice of proposed  
consent decree)

Notice of proposed consent decree lodged in the District of New Jersey regarding the Renora Superfund Site in Edison, New Jersey, under CERCLA Section 107. Comments will be accepted until October 30, 1987.

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George Bonina, WH-563  
Susan Bromm, WH-563  
Karen Brown, PM-220  
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Sylvia Lowrence, WH-562  
Kathy Collier, RTP, NC  
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Wayne Crane, PM-273F  
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Elaine Davies, WH-562  
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